

**UNITED STATES DISTRICT COURT  
FOR THE Northern District of Illinois  
Western Division**

Victoria C. McKenzie	)	
	)	
v.	)	Case No. 3:20-cv-50249
Plaintiff,	)	
	)	Hon. Phillips G. Reinhard
Illinois Department of Children and Family	)	
Services, et al.	)	
Defendants.	)	
	)	

**STATUS REPORT**

Now comes attorney for Plaintiff, Victoria C. McKenzie, with a status report per the Honorable Lisa A. Jensen's Minute Order #20 and states:

1. On July 6, 2020, Plaintiff Victoria C. McKenzie filed her Complaint in this Court along with leave to proceed *in forma pauperis*.
2. On July 9, 2020, Judge Reinhard struck Plaintiff's Complaint for failure to meet pleading requirements of Fed. R. Civ. P. 8(a)(2) and failure to state a claim on which relief maybe granted.
3. On. September 15, 2020 Plaintiff filed an Amended Complaint and a Motion for attorney representation, which the Court granted.
4. On September 16, 2020, the Honorable Lisa A. Jensen appointed Matthew S. Jarka to represent Plaintiff under Local Rules 83.11(h) and 83.37, and instructed counsel to file an appearance and status report informing the Court if counsel planned on filing an Amended Complaint or a statement that he cannot amend the Complaint consistent with his obligations under Rule 11 of the Federal Rules of Civil Procedure.
5. On October 22, counsel filed his appearance and the Court extended the due date of the status report to November 9, 2020.
6. Counsel was recovering from Covid-19 in early November and apologizes to this Court for missing the deadline.

7. Counsel has had several communications with the Plaintiff and, so far, has been unable to obtain from Plaintiff or Plaintiff's previous counsel the necessary information to file an Amended Complaint consistent with Rule 11.
8. Plaintiff states her medical conditions have made it difficult to remember the dates, names, and events on which she broadly based her originally filed Complaint in this matter. Additionally, Plaintiff states she has been unsuccessful in obtaining her "records" from the Illinois Department of Children and Family Services that would allow her to file an Amended Complaint that meets the pleading requirements.
9. Counsel requests an extension of ninety days from this Court in order to request Plaintiff's records from the 17th Judicial Circuit Court that might allow counsel to understand the nature and specificity of Plaintiff's grievances to determine if the Amended Complaint can be rehabilitated in accordance with Rule 11.
10. Counsel's request for extension is not made for purposes of delay, but rather to be able to fulfill the responsibilities of the Court's appointment.

WHEREFORE, Plaintiff submits this Status Report and request for extension.

Respectfully submitted,

/s/Matthew S. Jarka  
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